

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FOXMIND CANADA ENTERPRISES LTD.,

Plaintiff,
v.

ABCTEC, et al.,

Defendants.

CASE NO. Case 1:21-cv-05146-KPF

**DECLARATION OF XIALIAN ZHENG IN SUPPORT OF
DEFENDANT KONGJIANDIANZISHANGWU'S REPLY
IN FURTHER SUPPORT OF MOTION TO DISMISS**

I, Xialian Zheng, declare as follows:

1. I am a representative of Defendant Kongjiandianzishangwu in the above-captioned action.

2. I submit this declaration in support of Kongjiandianzishangwu's Reply in Further Support of Motion to Dismiss Complaint.

3. Kongjiandianzishangwu's sole place of business is in Fujian, the People's Republic of China, which is publicly accessible on Kongjiandianzishangwu's seller profile on Amazon.com. A true and correct copy of Kongjiandianzishangwu's profile is filed as Exhibit A to the declaration I submitted in support of Kongjiandianzishangwu's Motion to Dismiss – [D.E. 81].

4. In or around June of 2020, in order to be eligible to sell children's toys in the U.S. on Amazon.com, Kongjiandianzishangwu retained a vendor to handle the approval process.

5. Unbeknownst to Kongjiandianzishangwu, the vendor changed Kongjiandianzishangwu's address to a U.S. address during the process.

6. As soon as I discovered the change of address by the vendor, I immediately changed it back to Kongjiandianzishangwu's (Chinese) address.

7. As stated in my declaration submitted in support of Kongjiandianzishangwu's Motion to Dismiss [D.E. 81], the address of Kongjiandianzishangwu has been verified by one of Amazon's Seattle offices as true and genuine since May of 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 6, 2022 in China

Xialian Zheng
Xialian Zheng